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Catastrophe

Our File No. 66200n FJK

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IVAN ASCENCIO,

Plaintiff,

-AGAINST-

BANKER TRUST COMPANY, BATTERY
PARK CITY AUTHORITY, BLACKMON-
MOORING-STEAMATIC CATASTROPHE,
INC., D/B/A BMS CAT, ET AL.

Defendants.

INDEX NO.: 07CV1460

**NOTICE OF ADOPTION OF ANSWER
TO MASTER COMPLAINT**

PLEASE TAKE NOTICE THAT Defendant, BMS Catastrophe, Inc. s/h/a Blackmon-Mooring-Steamatic Catastrophe, Inc. d/b/a BMS Catastrophe, by their attorneys, Methfessel & Werbel, as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopts their Answer and defenses to the Master Complaint, dated July 26, 2007, which was filed in the matter of: *In Re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH)*.

To the extent that Defendant's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above captioned matter, Defendant, Defendant, BMS

Catastrophe, Inc., denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, the defendant, Defendant, BMS Catastrophe, Inc., demands judgment dismissing the above captioned action as against them, together with costs, disbursements and such other and further relief as this Court deems just and proper.

METHFESSEL & WERBEL, ESQS.
Attorneys for BMS Catastrophe

A handwritten signature in black ink, appearing to read "Frank J. Keenan", is written above the typed name.

By: _____
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DATED: New York, New York
September 10, 2007